

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-HARVARD
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS AT NEW
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION
OF UNIVERSITY PROFESSORS-
AMERICAN FEDERATION OF
TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT
OF STATE,

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, and the
DEPARTMENT OF HOMELAND
SECURITY,

TODD LYONS, in his official capacity as
Acting Director of U.S. Immigration and
Customs Enforcement,

DONALD J. TRUMP, in his official capacity
as President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

**DECLARATION OF KAYLA CHEN IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

I, Kayla Chen, hereby declare under penalty of perjury, that the following information is true to the best of my knowledge and state the following:

1. I am an attorney with an office in New York, New York. I am over 18 years of age and competent to testify on my behalf.
2. I am a member of good standing of every bar and court I am currently admitted to practice before. Specifically, I am a member in good standing of the State Bar of New York, the United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of New York.
3. There are no disciplinary charges pending against me in any jurisdiction. I have never been disciplined or sanctioned by a court or bar association.
4. I have never had a *pro hac vice* admission to this Court (or other admission for a limited purpose) revoked for misconduct.
5. I have read and agree to comply with the Local Rules for the United States District Court for the District of Massachusetts.
6. A regular member of the bar of this Court is advancing the present motion and has filed a notice of appearance in this case.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 10, 2025

Respectfully submitted,

/s/ Kayla Chen

Kayla Chen
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